

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

SEP 05 2017

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Rachael Rose DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RALPH ALLAN LEE SHORTEY,

a/k/a Brian Tilley,

a/k/a Jamie Tilley,

Defendant.

No. _____

Violations:

18 U.S.C. § 2252A(a)(1)

18 U.S.C. § 2252A(b)(1)

18 U.S.C. § 2251(a)

18 U.S.C. § 1591(a)(1)

18 U.S.C. § 1591(b)(2)

18 U.S.C. § 1591(c)

18 U.S.C. § 1594(a)

INDICTMENT

The Federal Grand Jury charges:

Introduction

At all times relevant to this Indictment:

1. **RALPH ALLAN LEE SHORTEY** was a resident of Oklahoma City, in the Western District of Oklahoma.

2. **SHORTEY** used telephone number 405-219-9346 for personal and business communications, with an AT&T account in his wife's name and linked to the Shorteys' home address in Oklahoma City, Oklahoma.

SHORTEY's Pseudonyms and Social Media Activities

3. On or about August 3, 2010, **SHORTEY** registered an America Online ("AOL") email address with username brinokc4u@aol.com. The AOL email account used screenname Brian Tilley, with a backup email address of brinokc4u@gmail.com.

4. On or about January 19, 2012, **SHORTEY** connected his Craigslist account with user ID 93092696 to phone number 405-219-9346. The email address linked to that Craigslist account in Craigslist's records was brinokc4u@aol.com.

5. On or about June 4, 2012, **SHORTEY** created a Facebook account, with vanity name brian.tilley.714, and a screenname shown as "Brian Tilley." The registered email addresses for the account were brinokc4u@aol.com and brian.tilley.714@facebook.com, with mobile phone number 405-219-9346 connected to the account and verified on June 4, 2012.

6. On or about July 24, 2012, **SHORTEY** registered the username "Brinokc4u" on Kik, a social media application that allows users to send and receive photos, videos, and text messages. The screenname for the account was "Jamie Tilley."

7. In various Craigslist ads in 2016, **SHORTEY** requested that anyone responding to his ads should communicate with him via Kik.

SHORTEY advised: "Brinokc4u is my kik name."

COUNT 1

(Transportation of Child Pornography)

8. The Federal Grand Jury incorporates paragraphs 1–7 by reference.

9. On or about October 10, 2013, in the Western District of Oklahoma and elsewhere,

————— **RALPH ALLAN LEE SHORTEY,**
a/k/a Brian Tilley,
a/k/a Jamie Tilley, —————

knowingly transported, and attempted to transport, child pornography using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, in that **SHORTEY** used his smartphone and his brinokc4u@aol.com email account to email a video titled "051st Time Sex Videos," which depicts a man engaging in sexually explicit conduct with a prepubescent girl, to Chubbybuddy6@hotmail.com.

All in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT 2

(Transportation of Child Pornography)

10. The Federal Grand Jury incorporates paragraphs 1–7 by reference.

11. On or about October 15, 2013, in the Western District of Oklahoma and elsewhere,

————— **RALPH ALLAN LEE SHORTEY,**
a/k/a Brian Tilley,
a/k/a Jamie Tilley, —————

knowingly transported, and attempted to transport, child pornography using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, in that **SHORTEY** used his smartphone and his brinokc4u@aol.com email account to email a video titled “boy group,” a video titled “boy group1,” a video titled “young boys f[***]ing,” and a video titled “young boy sucking c[***],” which depict boys engaging in sexually explicit conduct, to usmclpu87@yahoo.com, with the subject line “Kik” on the email.

All in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT 3
(Production of Child Pornography)

12. The Federal Grand Jury incorporates paragraphs 1–7 by reference.

13. At all times relevant to the Indictment, John Doe was a minor male, under the age of 18, and born in the year 2000.

14. In or around February 2016, **SHORTEY** began communicating

with John Doe on Kik regarding a posting on Craigslist. **SHORTEY** indicated to Doe that **SHORTEY** was interested in watching John Doe perform sex acts with a woman.

15. **SHORTEY** and Doe communicated via Kik, with **SHORTEY** as username Brinokc4u, going by the names “Jamie Tilley” and “Brian Tilley.” Between March 2016 and March 2017, **SHORTEY** communicated with Doe via Kik frequently.

16. Between on or about February 14, 2016, and on or about March 8, 2017, in the Western District of Oklahoma,

————— **RALPH ALLAN LEE SHORTEY,**
a/k/a Brian Tilley,
a/k/a Jamie Tilley, —————

employed, used, persuaded, induced, and enticed a minor, namely, John Doe, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce, in that **SHORTEY** so obtained at least one image of John Doe’s penis.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT 4
(Child Sex Trafficking)

17. The Federal Grand Jury incorporates paragraphs 1–7 and 13–16

by reference.

18. On or about March 8, 2017, **SHORTEY** and John Doe communicated via Kik. During their conversation on Kik on or about March 8, 2017, Doe told **SHORTEY**, "I need money for spring break." **SHORTEY** replied, "I don't really have any legitimate things I need help with right now. Would you be interested in 'sexual' stuff?" Doe responded, "Yes." The conversation continued with them discussing logistics of how and where Doe and **SHORTEY** would meet. The conversation also included explicit references to sexual conduct. For example, Doe told **SHORTEY**, "Hey keep updated cause I want you bad daddy." **SHORTEY** responded, "I'm gonna f[***] you like a good little boy if you keep calling me daddy." The message included a smiley face emoji after the word "boy."

19. After midnight on March 9, 2017, **SHORTEY** sent a message to Doe, "K, I'll be down the street a couple houses in about 10 minutes or so." At approximately 12:06 a.m., **SHORTEY** stated, "I35 about to exit 4th." At approximately 12:13 a.m., **SHORTEY** sent another message to Doe: "I'm here." Doe then left his home and got into a vehicle driven by **SHORTEY**. After stopping at a Circle K store in Moore, **SHORTEY** drove Doe to the Super 8 Motel located at 1520 North Service Road, at I-35 and 12th Street, in Moore, Oklahoma. **SHORTEY** rented Room 120 with his driver license and

credit card.

20. At all times relevant to this Indictment, the Super 8 Motel in Moore served intrastate and interstate travelers. It is a franchise location of a national hotel chain owned by a publicly-traded corporation headquartered in New Jersey.

21. At approximately 12:55 a.m. on March 9, 2017, Doe's father called the Moore Police Department, reporting that his son Doe was missing and had been seen entering a hotel room with an adult male at the Super 8 Motel in Moore, Oklahoma.

22. On March 9, 2017, the Moore Police Department dispatched officers to the Super 8 Motel in Moore, Oklahoma. At approximately 1 a.m., Moore Police Officers knocked on the door to Room 120 and **SHORTEY** advised them that the occupants were getting dressed. When **SHORTEY** opened the door, Doe left the room with his backpack, which contained a bottle of lotion.

23. Inside the room, Moore Police officers found **SHORTEY's** backpack. **SHORTEY's** backpack contained an opened box of condoms and a laptop computer.

24. Between on or around March 8, 2017, and on or around March 9, 2017, in the Western District of Oklahoma, in and affecting interstate

commerce,

RALPH ALLAN LEE SHORTEY,
a/k/a Brian Tilley,
a/k/a Jamie Tilley, _____

knowingly recruited, enticed, harbored, transported, obtained, maintained, patronized, and solicited, by any means, and attempted to do so, John Doe, having had a reasonable opportunity to observe John Doe, and knowing and in reckless disregard of the fact that John Doe would be caused to engage in a commercial sex act. John Doe had not attained the age of 18 years.


All in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c), and Title 18, United States Code, Section 1594(a).

A TRUE BILL



FOREPERSON OF THE GRAND JURY

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